

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARK OWEN, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

ELASTOS FOUNDATION, FENG HAN, and
RONG CHEN,

Defendants.

Hon. Gregory H. Woods

Civil Action No. 1:19-cv-5462-GHW

CLASS ACTION

NOTICE OF MOTION TO COMPEL

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated June 13, 2022, the accompanying Declaration of Javier Bleichmar, dated June 13, 2022, and exhibits attached thereto, and the Expert Report of Laura Wen-yu Young, dated June 13, 2022, and exhibits attached thereto, Plaintiffs Mark Owen and James Wandling will move this Court at the United States District Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time designated by this Court, for an Order, pursuant to Rules 34 and 37 of the Federal Rules of Civil Procedure, compelling Defendants Elastos Foundation, Feng Han, and Rong Chen to produce certain documents, as set forth in the accompanying Memorandum of Law.

Dated: June 13, 2022

Respectfully Submitted,

BLEICHMAR FONTI & AULD LLP

/s/ Javier Bleichmar

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